

1 DELMAR S. THOMAS (SBN 210825)
dthomas@yukelaw.com

2 JUSTIN M. MARVISI (SBN 294498)
jmarvisi@yukelaw.com

3 OLIVIA H. KIM (SBN 322535)
okim@yukelaw.com

4 YUKEVICH | CAVANAUGH
355 S. Grand Avenue, 15th Floor
5 Los Angeles, California 90071-1560
Telephone: (213) 362-7777
6 Facsimile: (213) 362-7788
Email: eservice@yukelaw.com

7 Attorneys for Specially Appearing
8 Defendant CASEY GROVER

9
10 **UNITED STATES DISTRICT COURT**

11 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

12 JULIA HUBBARD and KAYLA
GOEDINGHAUS,

13 Plaintiffs,

14 vs.

15 TRAMMELL S. CROW, JR.,
DR. BENJAMIN TODD ELLER,
16 RICHARD HUBBARD,
DR. MELISSA MILLER, DR. JOSEPH
17 BOLIN, DR. SCOTT WOODS,
DR. MRUGESHKUMAR SHAH,
18 MICHAEL CAIN, COE JURACEK,
PHILIP ECOB, H.J. COLE, TEXAS
19 RANGER CODY MITCHELL, KURT
KNEWITZ, PAUL PENDERGRASS,
20 RALPH ROGERS, ROBERT PRUITT,
SCOTT BRUNSON, CASE GROVER,
21 RICHARD BUTLER, MARK
MOLINA, MICHAEL HYNES, JR.,
22 SHAWN MAYER, JADE MAYER,
RCI HOSPITALITY HOLDINGS,
23 INC., INTEGRITY BASED
MARKETING, LLC, STORM
24 FITNESS NUTRITION, LLC, ULTRA
COMBAT NUTRITION, LLC,
25 ECOLOFT HOMES LLC, ELÉVATED
WELLNESS PARTNERS LLC, DOE
26 INDIVIDUALS 1–20, and DOE
COMPANIES 21–30,

27 Defendants.
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CASE NO. 2:22-cv-7957

Assigned to Honorable
Fernando L. Aenlle-Rocha

**DECLARATION OF DEFENDANT
CASEY GROVER IN SUPPORT OF
HIS MOTION TO DISMISS**

Date: March 31, 2023
Time: 1:30 p.m.
Dept: 6B, 6th Floor

Assigned to the Hon. Fernando L.
Aenlle-Rocha

YUKEVICH | CAVANAUGH
355 SOUTH GRAND AVENUE, FIFTEENTH FLOOR
LOS ANGELES, CALIFORNIA 90071-1560
Telephone (213) 362-7777
Facsimile (213) 362-7788

DECLARATION OF DEFENDANT CASEY GROVER

I, Casey Grover, declare as follows:

1. I have been named as a Defendant in this action. I make this Declaration in support of my Motion to Dismiss the Complaint for lack of personal jurisdiction. I have personal knowledge of the matters stated below and, if called upon to testify, I could and would competently testify thereto.

2. I received service of the Complaint in this action through mail to my home in McKinney, Texas.

3. On November 1, 2022 (the date that I understand the Complaint was filed), I resided in Texas and have resided there for approximately twenty-two (22) years. During any and all times identified in the Complaint, my domicile was in Texas – in other words, that was my home and where I intended to live indefinitely.

4. I have never consented to California jurisdiction.

5. Prior to moving to Texas in 2000, I lived in San Diego, California for approximately three years (1996 to 1999) working primarily as a DJ. I also started a business while in San Diego (performance shop for cars) but shut it down shortly after opening it. After leaving San Diego, I returned to California only once in 2002 for less than 24 hours to help a friend move.

6. Since leaving San Diego, I have not (1) performed any work that has any connection to California, (2) owned any real property in California, (3) owned or operated any businesses in California, (4) possessed any California bank accounts, or (5) paid any personal or business taxes in California.

7. Aside from this lawsuit, I have never been a party to a lawsuit in California.

8. I briefly worked with and dated Plaintiff Julia Hubbard in 2017, but all of my interactions and communications with her occurred in Texas, not California.

9. I have never met, spoken to, or heard of Plaintiff Kayla Goedinghaus prior to the filing of this lawsuit.

YUKEVICH | CAVANAUGH
355 SOUTH GRAND AVENUE, FIFTEENTH FLOOR
LOS ANGELES, CALIFORNIA 90071-1560
Telephone (213) 362-7777
Facsimile (213) 362-7788

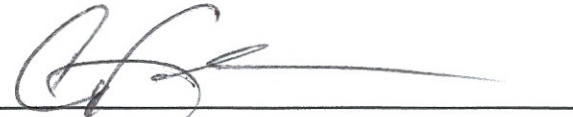
1 10. I have never met, spoken to, or heard of Defendant Benjamin Todd
2 Eller prior to the filing of this lawsuit.

3 11. I have never been in California with either Plaintiff or any of the named
4 Defendants as far as I am aware.

5 12. Because of my lack of connections with California, coupled with the
6 fact that whatever conduct is being alleged against me in this case would have
7 occurred in Texas, litigating this case in California makes no sense to me. Having
8 to travel to California for discovery and trial of this case would impose a significant
9 personal and financial burden on me.

10 I declare under penalty of perjury under the laws of the United States of
11 America that the foregoing is true and correct.

12 Executed in McKINNEY, Texas on February 22, 2023.

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CASEY GROVER

PROOF OF SERVICE

JULIA HUBBARD and KAYLA GOEDINGHAUS v. TRAMMELL S. CROW, JR. et al.
United States District Court -- Central District Case No. 2:22-cv-07957

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 355 South Grand Avenue, Fifteenth Floor, Los Angeles, CA 90071-1560.

On February 23, 2023, I served true copies of the following document(s) described as **DECLARATION OF DEFENDANT CASEY GROVER IN SUPPORT OF HIS MOTION TO DISMISS** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY CM/ECF NOTICE OF ELECTRONIC FILING: I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on February 23, 2023, at Los Angeles, California.



Chantel Y Estrada

SERVICE LIST

JULIA HUBBARD and KAYLA GOEDINGHAUS v. TRAMMELL S. CROW, JR. et al.
United States District Court -- Central District Case No. 2:22-cv-07957

John G. Balestriere, Esq.
 Matthew W. Schmidt
 BALESTRIERE FARIELLO
 225 Broadway, 29th Floor
 New York, NY 10007

Attorneys for PLAINTIFFS

Tel: (415) 966-2656
 Fax: (212) 208-2613
 Email:
john.balestriere@balestrierefariello.com
matthew.schmidt@balestrierefariello.com

Anastasia Mazzella, Esq.
 KABATECK LLP
 633 West Fifth St., Suite 3200
 Los Angeles, CA 90071

Attorneys for PLAINTIFFS

Tel: (213) 217-5007
 Fax: (213) 217-5010
 Email: am@kbklawyers.com

QUINN EMANUEL URQUHART &
 SULLIVAN, LLP

Attorneys for DEFENDANT COE JURACEK

Diane Doolittle, Esq.
 555 Twin Dolphin Dr., 5th Floor
 Redwood Shores, CA 94065

Tel: (650) 801-5000
 Fax: (650) 801-5100
 Email: dianedoolittle@quinnemanuel.com

Alex Bergjans, Esq.
 865 South Figueroa St., 10th Floor
 Los Angeles, CA 90017-2543

Tel: (213) 443-3000
 Fax: (213) 443-3100
 Email: alexbergjans@quinnemanuel.com

Adam J. DiClemente, Esq.
 51 Madison Ave., 22nd Floor
 New York, NY 10010

Tel: (212) 849-7000
 Fax: (212) 849-7100
 Email: adamdiclemente@quinnemanuel.com